

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

\*

VS.

\*

CASE NO. RDB 20-015

TAMUFOR ST. MICHAEL

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**CONSENT MOTION TO AMEND JUDGEMENT**

The Defendant, by and through his attorney, Robert C. Bonsib, Esq., respectfully requests this Honorable Court to amend the Judgement in this matter and, as reasons therefore, states as follows:

1. On May 16, 2023 the Defendant was sentenced as a result of his guilty plea in the above matter.

2. The Judgement in this matter directs that the Defendant be given credit for time served in federal custody during the period from July 22, 2019 through July 25, 2019.

In fact, the Defendant was arrested in this matter on July 19, 2020 (as noted in the Statement of Facts filed with the Defendant's plea agreement) and not released until July 25, 2019 and, therefore, should be given credit for time in federal custody from July 19, 2019 through July 25, 2019.

3. Assistant United States Attorney Kathleen Gavin has authorized undersigned counsel to represent that the government consents to this request to amend the Judgement.

WHEREFORE, it is respectfully requested that this Honorable Court direct the Clerk to amend the Judgement in this matter to credit the Defendant for time served in federal custody from July 19, 2019 through July 25, 2019.

Respectfully submitted,

*/s/ Robert C. Bonsib*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was sent, via electronic filing, this 15th day of June, 2023 to Assistant United States Attorney Kathleen Gavin.

*/s/ Robert C. Bonsib*

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ROBERT C. BONSIB